

## **EXHIBIT A**

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE**

**FEMHEALTH USA, INC., d/b/a  
CARAFEM,**

**Plaintiff,**

**v.**

**RICKEY NELSON WILLIAMS, JR.;  
BEVELYN Z. WILLIAMS, JR.;  
EDMEE CHAVANNES; OPERATION  
SAVE AMERICA; JASON STORMS;  
CHESTER GALLAGHER; MATTHEW  
BROCK; COLEMAN BOYD; FRANK  
LINAM; BRENT BUCKLEY; and AJ  
HURLEY;**

**Defendants.**

**Civil Action No. 3:22-cv-00565  
JUDGE CAMPBELL**

**DECLARATION OF** [REDACTED]

I, [REDACTED], declare as follows:

1. I am over the age of 18 and have personal knowledge of the matters set forth in this Declaration.

2. At all times relevant hereto, I have served as a [REDACTED]  
[REDACTED].

3. On the morning of July 26, 2022, an estimated 200 protesters gathered outside of the carafem Mount Juliet clinic. Among other things, the protesters were holding signs with depictions of fetuses, messages about carafem staff killing babies and calling us murders, and quoting Bible verses.

4. I interpreted the messages as designed to threaten and intimidate carafem staff and patients.

5. As a direct result of the type and volume of protesters, carafem adjusted its clinic staffing hours the morning of July 26, 2022, in order to open earlier and avoid the staff possibly encountering protestors on their way into the clinic.

6. Staff at carafem were directed to be on high alert throughout the day given the threatening and intimidating demeanor of the protesters.

7. As a result, I felt extremely anxious and scared coming into work and being at work.

8. At or around 10:30am on July 26, 2022, the clinic went into a security lockdown as the protesters physically approached and gathered at the entrance to the building.

9. During the security lockdown, carafem staff and clients immediately proceeded to the clinic safe room, where we waited for the security threat to be over.

10. At the time of the security lockdown, we had three (3) clients in the clinic whose visits were interrupted in order to get staff and clients to a safe space.

11. Later that same day, law enforcement informed us that the protesters were planning to return the next day. Upon learning this information, my feelings of fear and anxiety returned.

12. The following day, on July 27, 2022, the protesters were again gathered outside the clinic.

13. This time, the protesters set up what appeared to be a public address ("PA") system to amplify their messages of intimidation. They sang songs and spoke loudly through the speakers that what carafem did was wrong.

14. The PA system was so loud that you could hear everything the protesters broadcast in our client care rooms. We had to yell over the threats and intimidation to complete client care visits.

15. On July 28, 2022, the protesters returned again, and again set up the PA system. That day, in addition to messages of hate and intimidation, they also began broadcasting sounds of babies crying over the PA system. These sounds could be heard inside the clinic and clinic care rooms. The sound of babies crying was incredibly upsetting to patients and carafem staff alike. The noise again disrupted patient care and made it difficult to communicate.

16. Eventually I called the police department because of the noise and threatening content of the protesters' broadcast messages. I was informed that law enforcement was on the scene, but nothing changed.

17. At or around 11:25 a.m. on July 28, 2022, I was notified that someone was attempting to walk in to the clinic for an unscheduled visit. I advised that we were not accepting walk-ins at this time, which was contrary to our usual policy and was primarily due to security concerns as a result of the protesters.

18. Under usual operations, we regularly accept walk-ins for clinic visits. Many patients visit carafem as walk-ins for general reproductive health care needs, for example to fill prescriptions and for other routine reproductive healthcare. Oftentimes, our area's most vulnerable clients – for example, non-English speaking clients – utilize our walk-in service options for access to healthcare.

19. However, on July 28, 2022, the person(s) who claimed to be seeking a walk in appointment became belligerent and started screaming angrily that babies were being murdered in the building. More specifically, a group of two women and one man began screaming and did not stop for about ten (10) minutes.

20. As soon as the screaming began, the clinic again went into security lockdown, just as we did on July 26, 2022.

21. During lockdown, we heard the protesters screaming in the hallways and broadcast sounds of babies crying from outside the clinic on the sidewalk. It felt like we were surrounded, which was incredibly upsetting caused me significant anxiety.

22. During lockdown, I called 911 to alert them of what was happening. The dispatch team informed me that law enforcement was on the scene and asked if the protesters were armed and if law enforcement was in the clinic hallways. Out of fear, I did not want to go back into the hallways to check on this.

23. After I called 911, the police cleared the floor of protesters and eventually let the protesters leave the clinic premises.

24. Law enforcement has informed us that protesters from Operation Save America (“OSA”) are planning to occupy the hallway outside carafem in the time before August 25, 2022, when Tennessee’s new abortion trigger law takes effect.

25. This information has caused me additional anxiety, as this occupation could happen at any time and we may not have adequate security to protect us.

26. As a direct result of these protests, I am concerned for the safety of my co-workers and the patients we serve.

27. I am scared to leave the clinic to go home for family emergencies or run work-related errands, or take time off in case the occupation happens when I am not at work.

28. My personal life has been directly impacted by the protesters’ actions as well.

29. I am scared of being followed by protesters when I leave work.

30. I am constantly worried that the protesters will learn where I live, and I am fearful for the safety of my family and my young children.

31. I have increased anxiety, have trouble sleeping, and am living in a state of exhaustion and fear.

32. Out of fear for my family's safety, we have increased our home security equipment and measures, which has been a financial burden.

I provide the foregoing Declaration pursuant to 28 U.S.C. § 1746 and penalty of perjury.

Dated: August 9, 2022

/s/   
